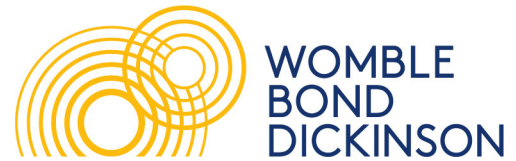


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September 30, 2024

The Honorable Leonard P. Stark  
United States District Court  
District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, Delaware 19801

Womble Bond Dickinson (US) LLP

1313 North Market Street  
Suite 1200  
Wilmington, DE 19801

t: 302.252.4320  
f: 302.252.4330

**Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, Case No. 17-mc-151**

Kevin J. Mangan  
Partner  
Direct Dial: 302-252-4361  
Direct Fax: 302-661-7729  
E-mail: [Kevin.Mangan@wbd-us.com](mailto:Kevin.Mangan@wbd-us.com)

Dear Judge Stark:

We represent Gold Reserve Inc. (“Gold Reserve”), an Additional Judgment Creditor and Potential Bidder in these proceedings.

We write with respect to the *Notice of Special Master’s Recommendation* (D.I. 1325) filed on September 27, 2024. Therein, the Special Master *inter alia* recommends to the Court a revised “briefing schedule and process related to the Proposed Sale Transaction.” *Id.* at 3. These recommendations are substantive and could have a material impact on the Sale Process. Specifically, they go directly to the schedule and process for “Topping Period,” i.e., the period of time in which Potential Bidders may submit alternative proposals (“Topping Bids”) after the Notice of Final Recommendation is filed.

Given that a robust, competitive Topping Period is a critical element in achieving the value-maximizing Sale Transaction that is the objective of the Sale Process, Gold Reserve respectfully requests that the Court set a briefing schedule for any interested parties to submit their position on the Special Master’s recommendations before a ruling is issued. In the circumstances, Gold Reserve submits that expedited briefing as follows would be appropriate:

- Responses to *Notice of Special Master’s Recommendation* (D.I. 1325) by any interested parties within ten days of its filing – by Monday, October 7, 2024
- Replies by Special Master within four days thereafter – by Friday, October 11, 2024

Gold Reserve also respectfully submits that a hearing likely should be held on these issues given their significance, but defers to the Court’s view as to whether such a hearing would be helpful.

Counsel for Gold Reserve provided a draft of this letter to counsel for the Special Master earlier today, before filing it with the Court, but the Special Master has not yet commented on this request.

We appreciate the Court's consideration.

Kind regards,

**Womble Bond Dickinson (US) LLP**

/s/ Kevin J. Mangan

Kevin J. Mangan

Matthew H. Kirtland (admitted *pro hac vice*)

**NORTON ROSE FULBRIGHT US LLP**

799 9th Street NW, Suite 1000

Washington, DC 20001

Telephone: 202-662-0200

matthew.kirtland@nortonrosefulbright.com

cc: Counsel of Record (via ECF)